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September 16, 2020

**VIA ECF**

Hon. Jesse M. Furman  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Application GRANTED. Defendant's deadline to respond to the complaint is EXTENDED to October 29, 2020, and the parties must complete mediation by the date of the initial pretrial conference. These deadlines will not be extended. The Clerk of Court is directed to terminate ECF No. 10. SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Jesse M. Furman', written over the date.

September 16, 2020

**Re: *Monegro v. The McCall Pattern Company, Inc.*,  
Civil Action No.: 1:20-cv-06791-JMF (S.D.N.Y.)**

Dear Judge Furman:

This office represents Defendant The McCall Pattern Company, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Frankie Monegro ("Plaintiff"), to respectfully request a 30-day extension of: (1) the deadline for Defendant to respond to the Complaint; and (2) the deadline for the parties to seek relief from the Court's early mediation requirement.

By way of background, Plaintiff commenced this action on or about August 24, 2020. (ECF No. 1.) On August 28, 2020, the Court issued an Order Regarding Early Mediation and the Initial Pretrial Conference (the "Order"). (ECF No. 8.) Under the Order, the Initial Pretrial Conference is scheduled for December 8, 2020, and the parties must conduct a mediation at least two weeks before the conference. (*Id.*) The parties have until the responsive pleading deadline to advise the Court by joint letter motion that early mediation would not be appropriate in this case and thus seek relief from this requirement. (*Id.*) Based on the purported service date of September 8, 2020, Defendant's responsive pleading is due on September 29, 2020.

This is the first request for an extension of the responsive pleading and joint letter deadline. Defendant is requesting this extension of these deadlines to provide it with additional time to investigate the allegations in the Complaint, and for the parties to explore a potential non-litigated resolution through direct discussions. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ John W. Egan*

John W. Egan

cc: All counsel of record (via ECF)